

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KRISTIN BENZINGER on behalf of herself,
Individually, and on behalf of all others similarly
situated,

Case No. 16-CV-8533 (PAE)

Plaintiff,

DECLARATION

- against -

LUKOIL PAN AMERICAS, LLC and
LITASCO SA,

Defendants.

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ADAM E. COLLYER, an attorney duly admitted to practice before this Court, hereby
declares subject to the penalties of perjury:

1. I am a partner of Lewis Brisbois Bisgaard & Smith LLP, attorneys for defendant
Lukoil Pan Americas, LLC (“LPA”). I submit this declaration in support of LPA’s motions *in limine*.

2. Annexed hereto as Exhibit A is a copy of Plaintiff’s Application for Employment at
Columbia University.

3. Annexed hereto as Exhibit B are Plaintiff’s Proposed Trial Exhibits 5 through 9.

4. Annexed hereto as Exhibit C is email correspondence from Plaintiff, dated September
30, 2015.

5. Annexed hereto as Exhibit D is email correspondence from Simon Fenner, dated
October 29, 2014.

6. Excerpts from the transcript of the deposition of Simon Fenner, taken on September
26, 2018, are annexed as Exhibit E.

7. Annexed hereto as Exhibit F is email correspondence from Simon Fenner, between
February 3 and February 7, 2015.

8. Excerpts from the transcript of Plaintiff's deposition, taken July 30, 2018, are annexed as Exhibit G.

9. Annexed hereto as Exhibit H are Defendant's Proposed Trial Exhibits B, C, D, H, and I.

10. Annexed hereto as Exhibit I is email correspondence between Plaintiff and Riot Games, between January 6 and January 16, 2015.

11. Excerpts of deposition transcript of Carrie Walker, taken November 9, 2018, are annexed as Exhibit J.

WHEREFORE, it is respectfully submitted that the Court should grant this motion and grant all other relief that it deems just and proper.

Dated: New York, New York
May 15, 2020

/s/ Adam E. Collyer
Adam E. Collyer

CERTIFICATE OF SERVICE

Adam E. Collyer, an attorney duly admitted to practice before this Court, certifies that on May 15, 2020, he caused to be served and filed via ECF the Declaration of Adam E. Collyer and supporting exhibits.

/s/ Adam E. Collyer
Adam E. Collyer